

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE ALUMINUM WAREHOUSING
ANTITRUST LITIGATION

13 MD2481 (KBF)

**DIRECT PURCHASER CLASS
PLAINTIFFS' NOTICE OF
MOTION FOR CLASS
CERTIFICATION AND
APPOINTMENT OF CLASS
COUNSEL**

This Document Relates To:

ECF CASE

DIRECT PURCHASER CASES
-----X

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Class Certification, Report of Dr. Christopher Gilbert, Report of Dr. J. Douglas Zona, Report of Mark Bodner, Declaration of Thomas Krizanosky, and Declaration of Susan R. Schwaiger, Esq., together with their supporting exhibits, and all other papers and proceedings herein, counsel for the Direct Purchaser Plaintiffs ("Plaintiffs") shall move this Court on a date, time and place to be set by the Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure to enter an order:

1. Certifying a Class defined as:

All persons who from February 2010 to March 25, 2016: (a) made a first level direct purchase of a primary aluminum product with a price term based, in any part, on the Midwest Transaction Price, the Platts Metals Week US Transaction Price or other "all in" price used in the United States, or the Midwest Premium, the Platts MW Premium or similar terminology or other regional premium used in the U.S., including but not limited to an averaging over a period of days of any such premium or adjusting for a grade or type of primary aluminum product; or (b) purchased a primary aluminum product directly from a Defendant. Excluded from the Class are Defendants, any parent, subsidiary, affiliate, agent or employee of any Defendant, and any co-conspirator.

As used in this definition, "primary aluminum product" means (1) T-bar, sow, standard ingot, foundry alloy T-bar or ingot, extrusion billet, slabs, sheet ingot, molten metal, rod, or any other product which contains at least 93% primary aluminum, or (2) aluminum can sheet or aluminum automotive sheet which contain primary aluminum.

2. Appointing Lovell Stewart Halebian Jacobson LLP, Nussbaum Law Group P.C. and Robbins Geller Rudman & Dowd LLP as Class Counsel; and
3. Directing such other relief that the Court deems appropriate.

Oral argument on this motion will be held on a date and time set by the Court.

DATED: March 25, 2016

Respectfully submitted,

 Christopher Lovell

Christopher Lovell
LOVELL STEWART HALEBIAN &
JACOBSON L.L.P.
61 Broadway, Suite 501
New York, NY 10006
Tel: (212) 608-1900
Fax: (212) 719-4677
Email: clovell@lshjllp.com

*Interim Co-Lead Counsel for Direct
Purchaser Plaintiffs and the Proposed
Direct Purchaser Class*

 Linda Nussbaum

Linda P. Nussbaum
NUSSBAUM LAW GROUP P.C.
570 Lexington Ave., 19th Floor
New York, NY 10022
Tel: (212) 702-7053
Fax: (212) 681-0300
Email: lnussbaum@nussbaumpc.com

*Interim Co-Lead Counsel for Direct
Purchaser Plaintiffs and the Proposed
Direct Purchaser Class*

Samuel Rudman ka

Samuel H. Rudman

ROBBINS GELLER RUDMAN &

DOWD L.L.P.

58 South Service Road, Suite 200

Melville, NY 11747

Tel: (631) 367-7100

Fax: (631) 367-1173

Email: srudman@rgrdlaw.com

*Interim Co-Lead Counsel for Direct
Purchaser Plaintiffs and the Proposed
Direct Purchaser Class*

Patrick Coughlin ka

Patrick Coughlin

ROBBINS GELLER RUDMAN

& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101

Telephone: (619) 231-1058

Fax: (619) 231-7423

Email: patc@rgrdlaw.com

*Interim Co-Lead Counsel for Direct
Purchaser Plaintiffs and the Proposed
Direct Purchaser Class*